#20 2D

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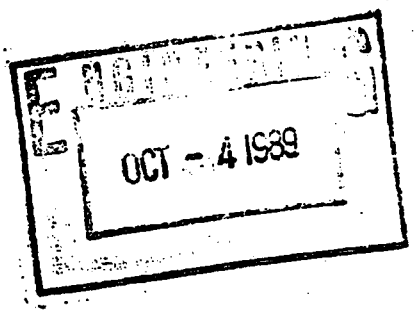
FILE #
40345-5

October 2, 1989

HAND DELIVERY

Mr. Thomas Sherman, Chief
Bureau of Hazardous Waste Engineering
Division of Hazardous Waste Management
Department of Environmental Protection
401 East State Street
CN 028
Trenton, New Jersey 08625



Re: RCRA Closure OT-100
Orbis Products
EPA I.D. No. NJD010910099

Dear Mr. Sherman:

I enclose for your review two sets of data pertinent to the above-captioned matter.

The addendum to the analytical data package (two volumes) represents the additional information requested by the New Jersey Department of Environmental Protection ("NJDEP") concerning soil samples taken in and around OT-100. The laboratory has presented the data in the order of the noted deficiencies presented in Mr. Sherman's letter of July 26, 1989.

The second package (two volumes) represents the analytical data from the confirmation sample obtained after the cleaning of OT-100. Based on our review of the data, we have concluded that the tank is now free of contaminants and as such should be disposed of as scrap metal. We await the Department's concurrence; as soon as we receive comments and instructions from the Department, Orbis will arrange for the disposal of OT-100.

253178

Metals	Nitric acid to below pH of 2
Mercury	Nitric acid to below ph of 2
Hexavalent Chromium	Cool to 4°C
Herbicides, Pesticides/PCBs	Cool to 4°C, maintain pH between 5-9
Purgeable Organics	Cool to 4°C
2,3,7,8-TCDD	Cool to 4°C
Cyanide	Cool to 4°C, Sodium Hydroxide to above pH of 12, 0.6g ascorbic acid/qt.
Phenols	Cool to 4°C, Sulfuric Acid to below pH of 2.

V. SAMPLE CUSTODY

The objective of the chain-of-custody procedure is to document the history of each sample and its handling. Custody records trace a sample from its collection through all transfers of custody until it is transferred to the analytical laboratory. Internal laboratory records then document the custody of the sample through its final deposition. A sample of our chain-of-custody records (Figure A-1) can be found on the following page.

Standard procedures are employed both in the field and in the laboratory to maintain the integrity of the sample custody. Such procedures include the tagging of all sample containers, the use of custody seals where applicable, the use of chain-of-custody forms and standard schedule, and control and security procedures within the laboratory.

Killam
Associates - Consulting Engineers

of the tank. Since no unacceptable levels of hazardous material will remain in the area once closure has taken place, no plan for post-closure maintenance has been developed.

II. SITE DESCRIPTION AND HISTORY

The Orbis facility encompasses approximately 6.5 acres, the majority of which is covered with impermeable material (i.e., buildings and pavement). The facility dates back to the early 1920's. Orbis Products Corporation was established in 1922 and began its operation in Newark around that time. Original operations included the manufacture of gums and powdered plant derivatives. In the late 1940's, Orbis Products Corporation became a subsidiary of Norda, Inc. Manufacturing operations in Newark were then changed to the production of aromatic chemicals and fine chemical intermediates.

III. DESCRIPTION OF RCRA FACILITY

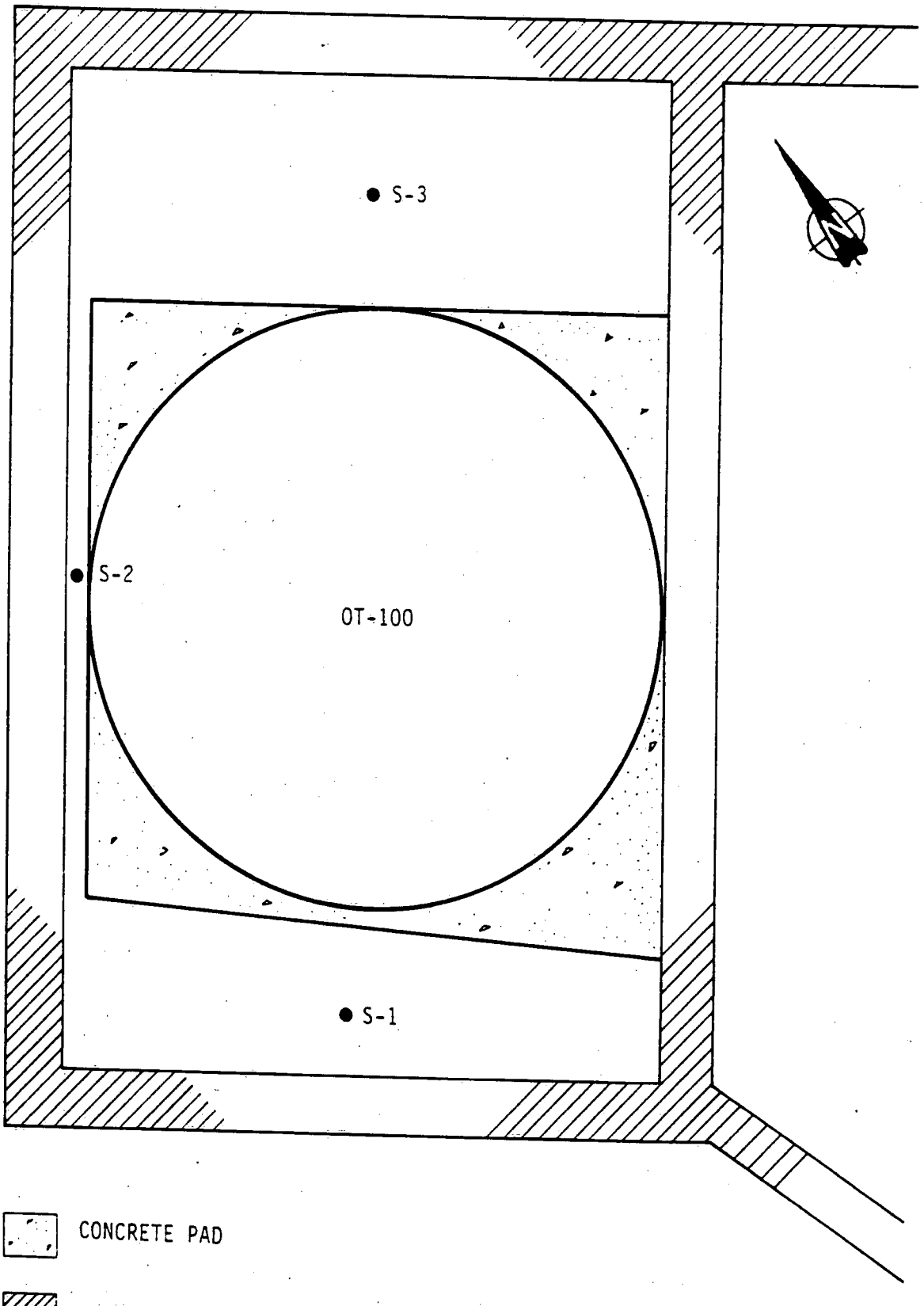
The RCRA facility at the Orbis site is the 10,000 gallon above ground steel storage tank known as OT-100. This tank was used in the 1970's to store non-commercial grade fuel which was burned on site. In the 1980's, Orbis stopped burning the fuel and shipped it off site as a regulated hazardous waste. Waste Conversion, Inc. of Hatfield, Pennsylvania was retained by Orbis for this purpose. OT-100 was also used to store waste solvents which were disposed of through Waste Conversion, Inc. as well. The tank has been empty since December, 1985.

OT-100 is a vertical tank surrounded by a concrete block dike as shown in Figure 2. The tank rests on a concrete pad. The space between the northern

dike wall and the concrete pad is filled with soil, the small space on the western side contains soil, and the space between the southern wall and the pad (the lowest end of the diked area) contains soil and water. There is no space between the eastern dike wall and the pad. Although no spills are known to have occurred in the diked area, some staining was noted inside the southern dike wall. It is unknown whether the diked area is underlain with concrete, but probing of the southern end seemed to indicate that at least that end had a concrete base. Additional investigation will be conducted to determine the presence of concrete under the soils noted. If a concrete base is found to be present, Orbis may elect to remove and properly dispose of the soils and test the concrete. If no concrete base is found, sampling will be undertaken as described in Section IV.

IV. PROPOSED SAMPLING PLAN

In order to investigate the quality of the soil within the diked area around OT-100, it is proposed that four samples be obtained at the locations shown in Figure 3. One soil sample will be obtained from each of the locations S-1 and S-2. These samples will be analyzed for priority pollutants plus 40 peaks (PP+40) and petroleum hydrocarbons (PHC). At the northern end of the diked area, where the most soil exists, two samples will be obtained from location S-3. The first sample will be obtained from a depth of six inches and analyzed for PP+40 and PHC. The second sample will be obtained from the same location but at a depth of 18-24 inches from the surface. A hand auger will be used to obtain this deeper sample which will be analyzed for volatile organic compounds and PHC only. The decision to reduce the analytical parameters for



CONCRETE PAD

CONCRETE BLOCK WALL

SAMPLE LOCATION

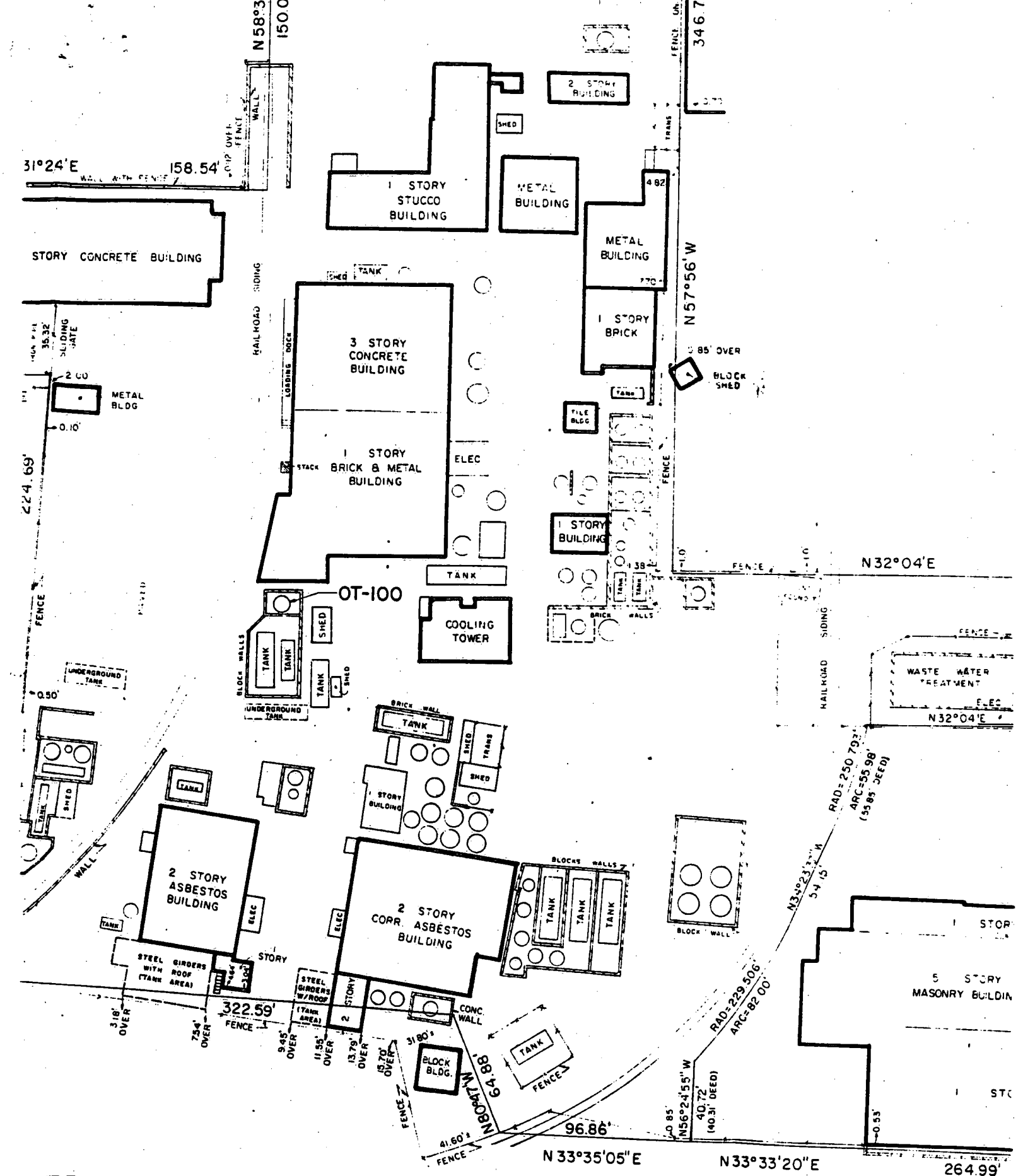
SCALE: 3/8" = 1'-0"

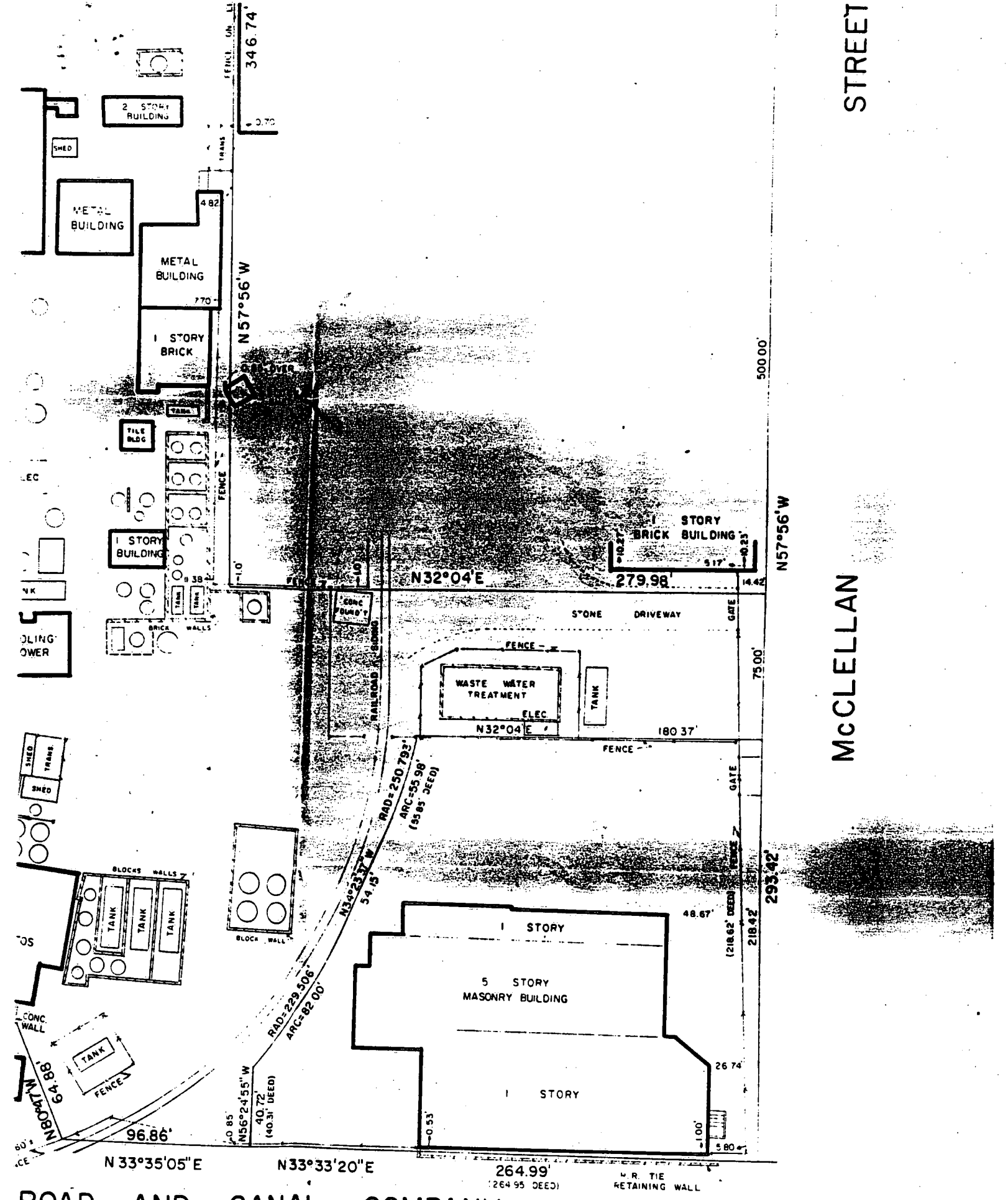
ORBIS PRODUCTS CORPORATION
NEWARK, NEW JERSEY

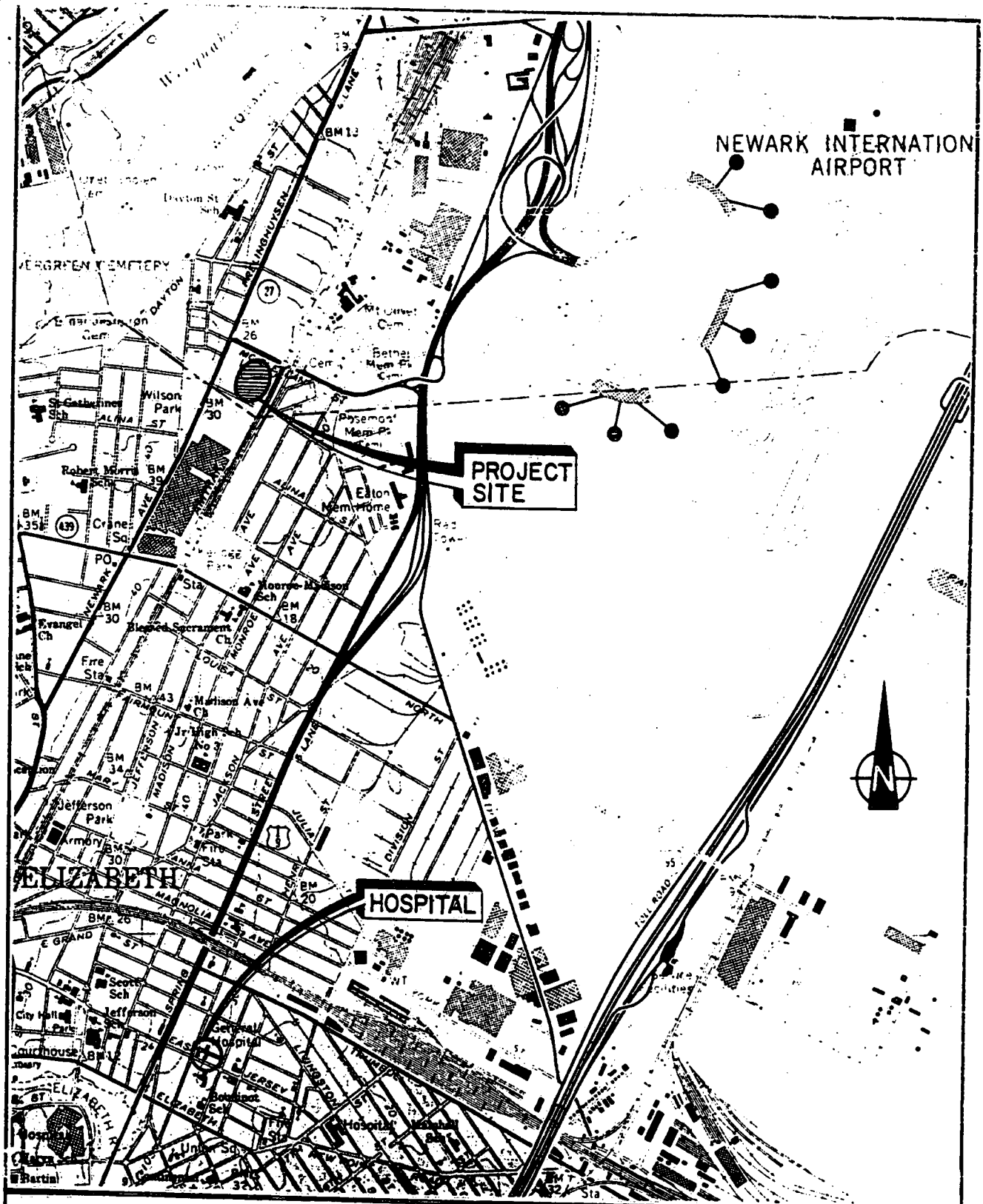
PROPOSED SAMPLING LOCATIONS

FIGURE 3

Elson T. Killam Associates, Inc.
Environmental and Hydraulic Engineers
27 Bleeker Street Millburn New Jersey 07041


N 58°3
150.0
31°24'E
158.54'
CHIP OVER FENCE
WALL WITH FENCE
STORY CONCRETE BUILDING
METAL BLDG
2.00
0.10'
224.69'
FENCE
UNDERGROUND TANK
0.50'
WALL
1 STORY STUCCO BUILDING
METAL BUILDING
2 STORY BUILDING
SHED
TRANS
4.82
METAL BUILDING
1 STORY BRICK
N 57°56' W
0.85' OVER
BLOCK SHED
TANK
FILE BLDG
FENCE
1 STORY BUILDING
1.38'
1.0'
1.6'
N 32°04'E
BRICK WALLS
RAILROAD SIDING
3 STORY CONCRETE BUILDING
1 STORY BRICK & METAL BUILDING
STACK
LOADING DOCK
ELEC
TANK
OT-100
COOLING TOWER
BLOCK WALLS
SHED
TANK
UNDERGROUND TANK
BRICK WALL
1 STORY BUILDING
WASTE WATER TREATMENT
E.E.
N 32°04'E
RAD=250.79'
ARC=55.98'
(55.85' DEED)
N 33°23'33" W
54.15'
2 STORY ASBESTOS BUILDING
2 STORY CORR. ASBESTOS BUILDING
BLOCK WALLS
BLOCK WALL
STEEL GIRDERS WITH ROOF (TANK AREA)
STORY
2 STORY
CONC. WALL
322.59'
FENCE
3.18' OVER
7.34' OVER
9.45' OVER
11.55' OVER
13.79' OVER
15.70' OVER
31.80'
BLOCK BLDG.
64.88'
N 80°04'47" W
FENCE
41.60'
RAD=229.50'
ARC=82.00'
N 56°24'55" W
40.72'
(40.31' DEED)
0.85'
96.86'
N 33°35'05" E
N 33°33'20" E
264.99'
(264.95' DEED)
0.53'
5 STORY MASONRY BUILDING
ITED NEW JERSEY RAILROAD AND CANAL COMPANY


STREET
McCLELLAN
346.74'
2 STORY BUILDING
SHED
METAL BUILDING
4.82
METAL BUILDING
1 STORY BRICK
N57°56'W
500.00'
TANK
TILE BLDG
FENCE
1 STORY BUILDING
N32°04'E
279.98'
1 STORY BRICK BUILDING
STONE DRIVEWAY
GATE
FENCE
WASTE WATER TREATMENT
ELEC
TANK
75.00'
N32°04'E
180.37'
FENCE
RAILROAD R. BOUND
RAD=250.793'
ARC=55.98'
(55.85' DEED)
N34°23'37"W
54.45'
SHED
TRANS
BLOCKS
WALLS
TANK
BLOCK WALL
1 STORY
5 STORY MASONRY BUILDING
1 STORY
48.67'
(218.62' DEED)
218.42'
293.42'
RAD=229.506'
ARC=82.00'
CONC. WALL
TANK
FENCE
N80°47'W
64.88'
N56°24'55"W
40.72'
(40.31' DEED)
0.85
0.53
1.00'
5.80'
26.74'
96.86'
N 33°35'05" E
N 33°33'20" E
264.99'
(264.95' DEED)
R.R. TIE
RETAINING WALL
.ROAD AND CANAL COMPANY



SCALE: 1" = 2,000'

MAP SOURCE: U.S.G.S. ELIZABETH, N.J.-N.Y.
7 1/2 MINUTE QUADRANGLE
PHOTO REVISED 1981

ORBIS PRODUCTS CORPORATION
NEWARK, NEW JERSEY

SITE LOCATION MAP

FIGURE B-1

Elson T. Killam Associates, Inc.
Environmental and Hydraulic Engineers
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